

Amendment dated 3/7/05
Response to Office Action dated 12/07/04

Application No. 09/945,469

REMARKS

Claims 1-44 are pending. Claims 1-44 stand rejected.

The Applicant believes that the finality of this Office Action is not proper because the Office Action introduces new grounds of rejection that are neither necessitated by the Applicant's amendment of the claims nor based on information submitted in an information disclosure statement. (MPEP § 706.07(a).) In particular, the Office Action introduces new rejections of independent claims 2, 21, 24, 30, and 35 under 35 U.S.C. 101. Additionally, the Office Action introduces the new rejection of independent claim 21 under 35 U.S.C. 103. The Applicant requests reconsideration of the finality of the Office Action.

The Applicant requests that the Examiner clarify the relevancy of *In re Danly* to the rejections of claims 1, 2, 3, 17, and 44. The Office Action alleges that the claims contain **non-functional language** and is given no patentable issue. However, in reference to *In re Danly*, the Office Action alleges that "Claims Directed to an Apparatus must be distinguished from the prior art in terms of **structure rather than function**." (Emphasis added.) By applying *In re Danly*, it appears that the Office Action inherently implies that the claim language is functional as discussed in MPEP § 2114 ("Apparatus and Article Claims – Functional Language"). Moreover, in accordance with MPEP § 2173.05(g), "A functional limitation **must** be evaluated and considered, just like any other limitation of the claim, for what it fairly conveys to a person of ordinary skill in the pertinent art in the context in which it is used." (Emphasis added.)

The Applicant thanks the Examiner for withdrawing the rejections of claims 1, 7, 11, 13-16, 29, 31-34, and 37-41 under 35 U.S.C. 112, second paragraph. The Applicant also thanks the Examiner for withdrawing the rejection of claim 21 under 35 U.S.C. 102(e).

Other Claim Amendments

The Applicant has amended claim 2 changing "the entity trust list" to "the at least one trust list" and "the transactional trust list" to "the at least one trust list" in order to maintain a proper antecedent basis.

Claims Rejections – 35 U.S.C. §112

Claims 17-20 are rejected by the Office Action under 35 USC 112, second paragraph for allegedly being indefinite for failing to particularly point out and distinctly claim the subject

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matter which the Applicant regards as the invention. The Office Action alleges that "the limitations 'the transactional trust list' and 'the entity trust list' " have insufficient antecedent basis. The Applicant has amended claim 17 to replace "the entity trust list" with "a entity trust list" and to replace "the transactional trust list" with "a transactional trust list" in order to establish a proper antecedent basis in claims 17-20. The Applicant requests reconsideration of claims 17-20.

Claims Rejections – 35 U.S.C. §101

Claims 2-35 and 40-43 are rejected by the Office Action under 35 U.S.C 101 for allegedly being directed to non-statutory subject matter. The Office Action alleges that "The claimed invention is not within the technological arts. Regarding claim 2, the Applicant has amended the claim to include "at least one computer for storing data and instructions and a processor for executing instructions stored in the storage; the storage containing instructions corresponding to". For at least the above reasons, claim 2 is within the technological arts. Similarly, the Applicant has amended claim 13 to include "at least one computer including a storage for storing data and instructions and a processor for executing instructions stored in the storage; the storage containing instructions corresponding to" while deleting "the transitive trust network system comprising at least one computer" in the preamble in order to clarify what is being claimed. Also, the Applicant has amended claim 17 to include "at least one computer including a storage for storing data and instructions and a processor for executing instructions stored in the storage; the storage containing instructions corresponding to" while deleting "the transitive trust network system comprising at least one computer" in the preamble in order to clarify what is being claimed.

Regarding method claim 20, the Applicant has amended the claim to be directed to "A method, **in a computer system**, of establishing a new business relationship with a sought entity over a network" and to include the features of "sending, **by a first computer to a second computer**, an inquiry to an intermediate entity to determine if the intermediate entity has an existing relationship with the sought entity;" and "receiving, **by the first computer**, a response from the intermediate entity indicating an existing relationship between the sought entity and the intermediate entity". (Emphasis added.) Claim 20 is clearly claimed to be within the technological arts. Similarly, the Applicant has amended claim 23 to be directed to "A method, **in a computer system**, of establishing a relationship with an unknown company" with the

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features of "querying, by a first computer to a second computer, at least one trusted company to determine the existence of a relationship between the at least one trusted company and the unknown company;" and "receiving, by the first computer, a confirmation of a relationship between the at least one trusted company, the confirmation being indicative of a trust level of the unknown company by one of the at least one trusted company and a corresponding at least one valuation criterion, the trust level of the unknown company being dependent on the corresponding at least one valuation criterion". Also, the Applicant has amended claim 24 to be directed to "A method, in a computer system, of establishing relationships between at least two entities' and to include the features of "receiving, by an associated computer, at a second entity a contact identifying a first entity" and "querying, another computer by the associated computer, if the first entity is not a trusted entity and if a proxy parameter is indicative that trusted entities are permitted to forward requests to other trusted parties, the trusted entities and specifying a predetermined degree of separation". Similarly, the Applicant has amended method claim 30 to be directed to "A method in a transitive trust network for providing a framework for at least two entities to establish relationships between one another, the transitive trust network including at least one computer" with the features of "receiving, by an associated computer, at a second entity a contact identifying a first entity" and "querying, another computer by the associated computer, if the first entity is not a trusted entity and if a proxy parameter is indicative that trusted entities are permitted to forward requests to other trusted parties, by the second entity at least a third entity of the trusted entities associated with the second entity, and specifying a predetermined degree of separation". Also, the Applicant has amended claim 35 to be directed to "A method in a transitive trust network for providing a framework for Companies to establish relationships between one another, the transitive trust network including at least one computer' and to include the feature of "contacting, between a first computer and a second computer, a first company by a second company regarding a potential relationship". Thus, independent claims 2, 13, 17, 21, 23, 24, 30, and 35 are within the technological arts.

The Office Action further states that "the courts have found that even if an invention incorporates abstract ideas, such as mathematical algorithms, the invention may nevertheless be statutory subject matter if the invention as a whole produces a 'useful, concrete and tangible result.' " Referring to method claims 21, 23, 24, 30, and 35, the claimed processes produce a "useful, concrete, and tangible result." For example, the claimed methods establish a business

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relationship between entities based on a level of trust using a list of trusted entities and querying trusted entities. As stated in MPEP 2106 (IV)(B)(2)(b)(ii), "A claim is limited to a **practical application** when the method, as claimed, produces a concrete, tangible and useful result." (Emphasis added.) Furthermore, as stated in MPEP 2106 (IV)(B)(2)(b)(ii), "For such subject matter to be statutory, the claimed process must be limited to a **practical application** of the abstract idea or mathematical algorithm in the **technological arts**." (Emphasis added.) Computer-related method claims 21, 23, 24, 30, 35 satisfy the above characteristics and thus are directed to statutory subject matter.

The Office Action further alleges that (Page 5.):

The independently claimed elements: an entity trust list containing at least one characteristic of at least two entities; and a transactional trust list containing a parameter relative to an exchange between at least two entities through at least one degree of separation between entities; the at least one parameter being indicative of an action that a trusted party can perform; a capability domain and activity trust level database for each of the at two entities, are abstract ideas which can be assessed mentally without interaction of a physical structure.

The Applicant respectfully disagrees. Regarding apparatus claims 2, 13, and 17, the Applicant has amended the claims to include the element of "at least one receiving component that obtains information from the entity trust list and the transactional trust list in order to provide a framework for at least two of the entities to establish relationships between one another" to better clarify the interaction within the physical structure. The amendments are supported by the present patent application as originally filed, e.g., Figure 15 and Paragraph 70. Moreover, referring to the specification as originally filed (Paragraphs 41 and 43), the concept of a "list", as claimed in claims 2, 13, and 17, is not abstract. A data structure is a well known concept in the computer art. Thus, "entity trust list", "transactional trust list", "at least one parameter", and "capability domain and activity trust level database", as claimed in claims 2, 13, and 17, interact within a physical structure of the transitive trust network system.

The Office Action further alleges that "the preamble comprises a general description of all the elements or steps which are conventional or known (MPEP 608.01 (i)(e).) and therefore, does not constitute an invention." The Applicant respectfully disagrees. MPEP 608.01 (i)(e) does state (Emphasis added.):

Where the nature of the case admits, as in the case of an improvement, any independent claim should contain in the following order, (1) a preamble

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comprising a general description of all the elements or steps of the claimed combination which are conventional or known, (2) a phrase such as "wherein the improvement comprises," and (3) those elements, steps and/or relationships which constitute that portion of the claimed combination which the applicant considers as the new or improved portion.

Claims 2, 13, and 17 are not claiming an improvement, and thus the suggestion provided by MPEP 608.01 (i)(e) is not applicable to the rejections of claims 2, 13, and 17.

For at least the above reasons, claims 2, 13, 17, 21, 23, 24, 30, and 35 are directed to statutory subject matter. Moreover, claims 3-12, 14-16, 18-20, 22, 25-29, and 31-34 ultimately depend from claims 2, 13, 17, 21, 23, 24, 30, and 35. The Applicant requests reconsideration of claims 2-35 and 40-43.

Claims Rejections – 35 U.S.C. §102

Claims 1-20, 23, and 44 are rejected by the Office Action under 35 USC 102(e) as being anticipated by US 2002/0128939 (Tarrant). Regarding claim 1, The Office Action alleges that "Information as to content of the instructions, including: receiving an inquiry; receiving a response; indicating availability of establishing new relationship; indicating a trust level about the sought entity by the intermediate entity; and determining whether information can be shared, is **non-functional** language and given no patentable weight. Claims Directed to an Apparatus must be distinguished from the prior art in terms of **structure rather than function**, *In re Danly* 263 F. 2d 844, 847, 120 USPQ 582, 531 (CCPA 1959)". (Emphasis added.) In *In re Danly*, the press structure of disputed claims 1 and 2 was not distinguished from any other tie rod in the prior art because "an alternating current may be passed through any tie rod which is insulated from the press frame". (120 USPQ 532.) Claim 1 is claimed in language that describes structure rather than function. For example, claim 1 claims a computer structure that includes "a computer including a storage for storing data and instructions and a processor for executing instructions stored in the storage". Also, the "confirming component" utilizes the response as received by the "response receiving component". While a tie rod cannot be distinguished from another tie rod of disputed claims 1 and 2 in *In re Danly*, each component is distinguished from the other components as claimed in claim 1. For at least the above reasons, all features of claim 1 should be given patentable weight. At least the claimed features of "an inquiry receiving component for receiving an inquiry from the seeking entity", "a response receiving component for receiving a response indicating an existing relationship between the sought entity and an intermediate

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entity", "a confirming component for confirming, based on the response, that the new relationship may be established, the response being indicative of a trust level of the sought entity by the intermediate entity regarding the existing relationship", and "a verification component for determining whether information can be shared between entities in accordance with rights management" are not found in Tarrant, and the Office Action does not even allege that they are found in Tarrant. Because all features are not taught in Tarrant, the Applicant requests reconsideration of claim 1.

Regarding claim 2, the Office Action alleges that "Information as to content of the database and instructions, including: characteristics of entities; a level of trust being gauged by the at least one characteristic; and a parameter relative to an exchange between two entities, is non-functional language and given no functional weight. Claims Directed to an Apparatus must be distinguished from the prior art in terms of **structure rather than function**, *In re Danly* 263 F. 2d 844, 847, 120 USPQ 582, 531 (CCPA 1959)". (Emphasis added.) Claim 2 is claimed in language that describes structure rather than function. Unlike the disputed claims in *In re Danly*, claim 2 is distinguished from prior art in terms of structure. For example, claim 2 includes "at least one computer for storing data and instructions and a processor for executing instructions stored in the storage". The storage contains instructions corresponding to at least one entity trust list that includes at least one characteristic of at least two entities of the transitive trust network system. Also, the at least one transactional trust level contains, for example, a proxy parameter that indicates an action that a trusted party can perform for a trusting party. "At least one receiving component obtains information" (e.g., the at least one characteristic and the at least one parameter) "from the at least one entity trust list and the at least one transactional trust list in order to provide a framework for at least two of the entities to establish relationships between on another." For at least the above reasons, the claimed apparatus of claim 2 is structurally distinguished from the prior art, and thus all features of claim 2 should be given patentable weight. At least the claimed features of "at least one entity trust list containing at least one characteristic of at least two of the entities, a level of trust being gauged by the at least one characteristic" and "at least one transactional trust list containing at least one parameter relative to an exchange between at least two of the entities through at least one degree of separation between the entities, the at least one parameter comprising a proxy parameter, the proxy parameter being indicative of an action that a trusted party can perform on behalf of a trusting

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party” are not found in Tarrant, and the Office Action does not even allege that they are found in Tarrant. Because all features are not taught in Tarrant, the Applicant requests for reconsideration of claim 2.

Regarding independent claim 13, the Office Action alleges “Information as to content of the database and instructions, including characteristics of entities; a level of trust being gauged by the at least one characteristic; and a parameter relative to an exchange between two entities; a parameter being indicative of an action that a trusted party can perform; a capability domain for each of the at least two entities, is non-functional language and given no functional [patentable] weight. Claims Directed to an Apparatus must be distinguished from the prior art in terms of structure rather than function, *In re Danly*”. Claim 13 is claimed in language that describes structure rather than function and is distinguished from prior art in terms of structure. For example, claim 13 includes “at least one computer including a storage for storing data and instructions and a processor for executing instructions stored in the storage”. The storage contains instructions corresponding to an entity trust list that includes a characteristic of at least two entities of the transitive trust network system. Also, each entry of the capability and activity trust data base for each entry is indexed by an entity role and a level of trust “At least one receiving component obtains information” (e.g., the at least one characteristic and the at least one parameter) “from the entity trust list and the transactional trust list in order to provide a framework for at least two of the entities to establish relationships between on another.” For at least the above reasons, the claimed apparatus of claim 13 is structurally distinguished from the prior art, and thus all features of claim 13 should be given patentable weight. At least the claimed features of “an entity trust list containing at least one characteristic of at least two of the entities, a level of trust being gauged by the at least one characteristic” and “a transactional trust list containing at least one parameter relative to an exchange between at least two of the entities through at least one degree of separation between the entities, the at least one parameter comprising a proxy parameter, the proxy parameter being indicative of an action that a trusted party can perform on behalf of a trusting party” and “a capability domain and activity trust level data base for each of the at least two entities, the data base having a plurality of levels of trust and a plurality of entity roles, the capability domain and activity trust data base comprising a plurality of entries, each entry being indexed by an entity role and a level of trust, each said entry being indicative of a corresponding business process” are not found in Tarrant, and the Office

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Action does not even allege that they are found in Tarrant. Because all features are not taught in Tarrant, the Applicant requests for reconsideration of claim 13.

Regarding claim 17, the Office Action alleges that "Information as to content of the database and instructions, including a capability for each of the at least two entities; a plurality of levels of trust and a plurality of entity roles, is non-functional language and given no functional [patentable] weight. Claims Directed to an Apparatus must be distinguished from the prior art in terms of structure rather than function. *In re Danly*". Claim 17 is claimed in language that describes structure rather than function and is distinguished from prior art in terms of structure and is distinguished from prior art in terms of structure. For example, claim 17 includes "at least one computer including a storage for storing data and instructions and a processor for executing instructions stored in the storage". The storage contains instructions corresponding to "at least one receiving component obtains information from the entity trust list and the transactional trust list in order to provide a framework for at least two of the entities to establish relationships between on another". For at least the above reasons, the claimed apparatus of claim 17 is structurally distinguished from the prior art, and thus all features of claim 17 should be given patentable weight. At least the claimed feature of "a capability domain and activity trust level data base for each of the at least two entities, the database having a plurality of levels of trust and a plurality of entity roles" is not found in Tarrant, and the Office Action does not even allege that it is found in Tarrant. Because all features are not taught in Tarrant, the Applicant requests for reconsideration of claim 17.

Regarding claim 44, the Office Action alleges "Information as to specific content of said databases, and said information as to storing a trust level for each directly interconnected entity and at least one corresponding valuation criterion for determining the trust level is non-functional language and given no functional [patentable] weight. Claims Directed to an Apparatus must be distinguished from the prior art in terms of structure rather than function. *In re Danly*". Claim 44 is claimed in language that describes structure rather than function and is distinguished from prior art in terms of structure and is distinguished from prior art in terms of structure. Claim 44 claims apparatus that is structurally distinguished from the prior art. For example, claim 44, as amended, includes "a computer including a storage for storing data and instructions and a processor for executing instructions stored in the storage". The storage contains instructions corresponding to a transactional component that utilizes information from

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the trust component in order to provide peer-to-peer capability for sharing information with the other interconnected entity. For at least the above reasons, all features of claim 44 should be given patentable weight. At least the claimed feature of "a trust component that stores a trust level for each directly interconnected entity and at least one corresponding valuation criterion for determining the trust level and that obtains an associated trust level of a sought entity through an interconnected intermediate entity if the sought entity is not directly interconnected to the selected entity" is not found in Tarrant, and the Office Action does not even allege that it is found in Tarrant. Because all features are not taught in Tarrant, the Applicant requests for reconsideration of claim 44.

Regarding claim 23, the Office Action alleges that Tarrant teaches "Said method, comprising: sending an inquiry to an intermediate entity; receiving a response from the intermediate entity; establishing a new business relationship with the sought entity based on the response, the response being indicative or [of] a sought entity and of a corresponding valuation criterion (trustworthiness) [0018]; [0021]". However, Tarrant does not teach the feature of "receiving a confirmation of a relationship between the at least one trusted company, the confirmation being indicative of a trust level of the unknown company by one of the at least one trusted company and a corresponding at least one valuation criterion, the trust level of the unknown company being dependent on the corresponding at least one valuation criterion." (Emphasis added.) Tarrant does disclose (Paragraph 0018. Emphasis added.):

(d) in response to the request from the second user, transmitting the data from the relational database to a second user computer, wherein, absent a request from the second user for data from a specific source or level of trustworthiness, the data transmitted comprise data from users of the highest level of trustworthiness available. In particular embodiments, data received from the first user comprise alternative investment data; sources of the highest level of trustworthiness comprise investment managers, fund administrators, or fund sponsors; sources of at least one level of trustworthiness comprise investors, and the investor level is subdivided into two or more sublevels that are determined at least partly by reliability of previously submitted information; sources of at least one level of trustworthiness comprise investors, and the investor level is subdivided into two or more sublevels, and an investor's sublevel is determined at least partly by amount of demand for the investor's information by other investors; and alternative investment data from the first user comprise fund data.

Tarrant merely teaches about a trust level and not about a trust level and a corresponding valuation criterion, from which the trust level is dependent.

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Claims 3-12, 14-20, and 40-41 ultimately depend from claims 1, 2, 13, and 17. The Applicant requests reconsideration of claims 1-20, 23, and 44.

Claims Rejections – 35 U.S.C. §103

Claims 21-22, 24, 30, 35-36, and 42-43 are rejected under 35 USC 103(a) as being unpatentable over Tarrant in view of US 2002/0078003 (Krysiak). Regarding claim 21, the Office Action admits that “Tarrant does not explicitly teach establishing a business relationship with the sought entity based on the response.” However, the Office Action alleges that “Krysiak et al. teach [teaches] a method and system for identifying information sources based on one or more trust networks associated with one or more knowledge domains, wherein a business relationship is established based upon an evaluation of trustworthy [trustworthiness] of a sought party [0014].” However, Krysiak does not teach or even suggest the feature of “establishing the new business relationship with the sought entity based on the response, the response being indicative of a trust level of the sought entity by the intermediate entity and of a corresponding valuation criterion, the trust level being dependent on the corresponding valuation criterion.” (Emphasis added.) Krysiak does teach [0014]:

The present invention eliminates the user's need to wade through numerous e-mail responses in conjunction with a widely-disseminated request for an information source. It also eliminates a user's reliance on Newsgroups to located desired information. It efficiently and explicitly addresses the problem of expertise location within an organization. It allows a database to learn from the types of information sources that users search for. It recognizes that the true value of most corporate information is the way in which it connects people to people, allowing them to share their expertise at the moment of inquiry, thus realizing and appreciating that cutting-edge thinking is always changing in a way that a traditional, static, and centrally-maintained knowledge database cannot capture. It accepts search requests for an information source and provides a path connection to the information source based on a computed trust probability that the information source will be deemed reliable. The computed probability reflects an individual's self-evaluation and various peer-evaluations in a given knowledge domain. The present invention thus facilitates the selection of an expert within an organization by identifying various knowledge domains and the experts therewithin, and then providing a most trusted path connection from that user to that expert through the trust network.

While Krysiak appears to disclose a “trust probability,” Krysiak does not even suggest a corresponding valuation criterion and a trust level that is dependent on the corresponding valuation criterion. The Applicant requests reconsideration of claim 21.

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Regarding claim 24, the Office Action alleges that "Tarrant teaches "receiving at one entity a contact identifying another entity; identifying said another entity as a member of a trusted entities list; establishing a business relationship with the sought entity based on the information being indicative of the level of trustworthiness of said another entity". The Office Action further admits that "Tarrant does not specifically teach the degree of separations between the entities." The Office Action alleges (pages 19-20) that:

In response to the applicant's argument that prior art does not teach querying, if the first entity is not a trusted entity and if there is an indication that trusted entities are permitted to forward requests to the other trusted parties, and specifying a predetermined degree of separation, it is noted that Krysiak does teach these features. Specifically, Krysiak teaches that during 'trust search' if the first entity (Bob) has lower level of 'trustworthiness' (self-evaluation) then the other party (Jane or Joe), the request is forwarded to said other parties with indicating a degree of separation [0070]; Figs. 10-14."

However, Krysiak does not teach the feature of "querying, if the first entity is not a trusted entity and if a proxy parameter is indicative that trusted entities are permitted to forward requests to other trusted parties, the trusted entities and specifying a predetermined degree of separation." (Emphasis added.) Krysiak does teach (Paragraph 70):

FIG. 11 depicts a representative trust network 320 for an organization. In the context of this specification, a trust network generally refers to a network of one or more relationships between one or more entities that provides an evaluation (self-evaluation and peer-evaluation) concerning a knowledge domain. Within this representative trust network, a first user 321 ("Bob") has a self-evaluation of 2 for a given knowledge domain; a second user 322 ("Jane") has a self-evaluation of 4; a third user 324 ("Joe") has a self-evaluation of 9; a fourth user 326 ("Jim") has a self-evaluation of 3; a fifth user 328 ("Sue") has a self-evaluation of 5; a sixth user 330 ("Sandy") has a self-evaluation of 3; and a seventh user 332 ("Sarah") has a self-evaluation of 8. As indicated by lines connecting the users, assume further that Bob knows Jane; Jane knows Joe and Sue; Joe knows Jim, Sue, and Sandy; and Sue knows Sarah. Further, assume that Bob's peer-evaluation of Jane is 6; Jane's peer-evaluation of Joe is 2 and of Sue is 9; Joe's peer-evaluation of Jim is 3, of Sue is 4, and of Sandy is 7; and that Sue's peer-evaluation of Sarah is 8.

While there is a degree of separation between Bob and Jane, Krysiak does not even suggest specifying a predetermined degree of separation. Thus, claim 24 is patentable for at least the above reasons. The Applicant requests reconsideration of claim 24.

Regarding claim 30, the combination of Tarrant and Krysiak does not teach the feature of "querying, if the first entity is not a trusted entity and if a proxy parameter is indicative that

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trusted entities are permitted to forward requests to other trusted parties, by the second entity at least a third entity of the trusted entities associated with the second entity, and specifying a predetermined degree of separation" as discussed above. The Applicant requests reconsideration of claim 30.

Regarding claim 35, the Office Action has not shown any teachings that even suggest the features of "forwarding, by the third company, based on a respective list of peers thereof and a trust agreement between the first company and the third company, a 'Do You Know' query to further Companies on behalf of the first company, verifying rights management models between all peers" and "responding by the respective company to the third company with an affirmative on knowing the second company, in response to the 'Do You Know' query". The Office Action admits that "Tarrant and Krysiak et al. do not specifically teach forwarding a "Do You Know" query to further companies. Examiner points out that there is no indication in the specification that said feature ("Do You Know" query) provides the advantage over the prior art. Without such indication, it appears that the use of said query **appears to be an obvious variation of relationship inquires.**" (Emphasis added.) While the Office Action alleges the belief that the said feature appears to be obvious, the Office Action fails to provide a teaching that even suggests the feature. Thus, the Office Action has failed to establish *prima facie* obviousness. The Applicant requests reconsideration of claim 35.

Regarding claim 36, the combination of Tarrant and Krysiak does not teach the feature of "querying, if the first entity is not a trusted entity and if a proxy parameter is indicative that trusted entities are permitted to forward requests to other trusted parties, the trusted entities and specifying a predetermined degree of separation" for at least the above reasons. The Applicant requests reconsideration of claim 36.

Claims 22 and 42-43 ultimately depend from claims 21, 24, and 30 and are patentable for at least the above reasons. The Applicant requests reconsideration of claims 22 and 42-43.

Claims 25-29, 31-34, and 37-39 are rejected by the Office Action as being unpatentable over Tarrant and Krysiak in view of US 2002/0152086 (Smith). Claims 25-29 and 31-34 depend from claim 24 and 30. Moreover, Smith does not make up for the deficiencies of Tarrant and Krysiak, and thus claims 25-29 and 31-34 are patentable for at least the above reasons. Regarding claim 37, the Office Action alleges that (Page 20):

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In response to the applicant's argument that the prior art does not teach a database structure which is indexed by the capability domain and the activity trust domain to obtain a corresponding business process, it is noted that Krysiak teaches said method and system, including web pages (databases) displaying information regarding available type of services (capability) (Figs. 3 and 4) and "trustworthy" rating (Fig. 10).

However, Krysiak does not teach or even suggest the feature of "a respective business process of a plurality of business processes being associated with each combination of a respective role of the plurality of roles and a respective trust level of the plurality of trust levels, wherein the data structure is indexed by the capability domain and the activity trust domain to obtain a corresponding business process." (Emphasis added.) Referring to Figs. 3, 4, and 10, it appears that Krysiak merely teaches obtaining levels of trustworthiness, as presented on Search Result Display screen 310 in Fig. 10. Correspondingly, Krysiak teaches (Paragraph 68):

Referring now to the Search screen 120, which is preferably accessible from any of the representative display screens of FIGS. 3-9, it is preferably used in order to locate an expert or other information source in a specific knowledge domain. Standard Boolean operators are preferably employed, as understood by those skilled in the art. The Search screen 120 works in conjunction with the trust engine 52 of the application server 40, the results of which are presented on a Search Result Display screen 310, as representatively depicted in FIG. 10. The Search Result Display screen 310 is preferably categorized by five categories, including a Who category 312, an Others Rating category 314, a Self Rating category 316, a Distance category, and a Path category 319.

Categories, as taught by Krysiak, appear to function as indices. For example, referring to Fig. 10 of Krysiak, one obtains a trustworthiness value of 7.1 for "Jane T" corresponding to Who category 312 and Others Rating category 314. However, Krysiak does not even suggest obtaining a corresponding business operation from the data structure associated with Search Result Display screen 310. Tarrant and Smith does not make up for the deficiencies of Krysiak, and thus claim 37 is patentable over the combination of Tarrant, Krysiak, and Smith. Because claims 38 and 39 depend from claim 37, claims 38 and 39 are patentable for at least the above reasons.

For the reasons, as discussed above, the Applicant requests reconsideration of claims 25-29, 31-34, and 37-39.

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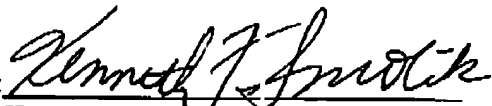
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CONCLUSIONS

All objections and rejections have been addressed. Hence, it is respectfully submitted that the present application is in condition for allowance, and a notice to that effect is earnestly solicited.

Respectfully submitted,

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